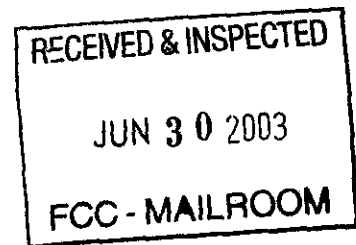


**George B. Hutchison**

11224 S.E. 320<sup>th</sup> Street  
Auburn, Washington  
98092-4832  
253-833-6755



25 June 2003

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Dear Ms. Dortch

Please accept the accompanying ten volumes as my filing to the commission to establish the Homeland Public Press and Information Widecast Service.

Any of the volumes can be accepted as an original, as all are individually signed by myself on page 19 of the petition.

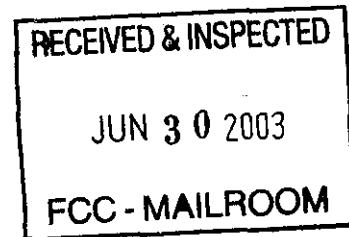
Accompanying this letter is a copy of the title page of the presentation, so that it may be stamped and returned as a receipt for the submission.

A self-addressed postage-paid envelope is enclosed for your convenience.

Sincerely,

A handwritten signature in cursive script that reads "George B. Hutchison".

George B. Hutchison



**Before the  
Federal Communications Commission  
Washington, D.C**

**A Petition For Rulemaking  
To Establish, Administer, and Regulate  
The Homeland Public Press  
And Information Widecast Service**

**By**

**George B. Hutchison  
11224 S.E. 320<sup>th</sup> Street  
Auburn, Washington 98092-4832**

**23 June, 2003**

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OET 03-237

## TABLE OF CONTENTS

<b>I - The Petition.....</b>	<b>1</b>
<b>II - Discussion</b>	
A. Description.....	2
B. Purpose.....	2
C. Why An Alternative Service.....	3
D. The Experiment.....	3
E. Who Could and Who Was Listening /Copying?.....	6
F. What Methods Are Employed to Copy/Listen?.....	7
G. The Survey.....	8
H. The Conclusion of the Experiment.....	9
I. Why No Text Transmissions At This Time?.....	10
J. What Is Envisioned.....	11
K. A Cooperative Effort.....	14
L. Proposed Rules.....	15
M. The Application Process.....	16
<b>III - Summary.....</b>	<b>18</b>
<b>IV - Exhibits</b>	
Exhibit One - Photo of Transmission Being Received on Teletypewriter Device for the Deaf (TDD) Device	
Exhibit Two - Survey Form and the Responses to the Survey	
Exhibit Three - NASDAW Incorporation Documents (National Association of Data Widecasters)	
Exhibit Four - Proposed Rules and Regulations for the Homeland Public Press and Information Widecast Service	
Exhibit Five -	
A. Revised Instruction Sheet for FCC Form 601 Main Form	
B. Revised Instruction Sheet for FCC Form 601 Schedule D	
C. Prototype Instruction Sheet for FCC Form 601 Schedule W (Application for Homeland Public Press and Information Widecast Service)	
D. Prototype for FCC Form 601 Schedule W	

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**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

**In the Matter of** )  
 )  
**Petition for Rulemaking to** )  
**Amend the rules of the Commission to** )  
**Establish, Administer, and Regulate the** )  
**Homeland Public Press and Information Widecast Service** )

**To: The Commission**

**PETITION FOR RULEMAKING**

**The petitioner, George B. Hutchison, respectfully submits this Petition for**  
**Rulemaking to amend the Rules of the Commission to Establish,**  
**Administer, and Regulate the Homeland Public Press and Information Widecast**  
**Service.**

24 **DISCUSSION**

25  
26 **DESCRIPTION**

27  
28 **The Homeland Public Press and Information Widecast Service (the service)**  
29 **would be a means whereby text items containing news and information would**  
30 **be disseminated via high-frequency (3 to 30 Mhz) radio signals to the general**  
31 **public of the United States of America. The transmissions would employ**  
32 **digital signaling methods including Radio-Teletypewriter, AMTOR/SITOR (FEC),**  
33 **and PSK-31.**  
34

35 **PURPOSE**

36  
37 **The service would be an alternate to conventional AM/FM/TV news and**  
38 **information broadcast services, and be a method whereby those in remote**  
39 **locations could be kept up to date with regard to news, information, weather,**  
40 **and other items of interest in a printed format. The service would also transmit**  
41 **daily bulletins and advisories of the Department of Homeland Security as to**  
42 **alert status and other anti-terrorism advisories related to the mission of the**  
43 **Department of Homeland Security. In times of national emergency, the service**  
44 **would be available as a full time, dedicated communications channel for the**  
45 **Department of Homeland Security and able to reach listeners at locations where**

46 conventional communications services may be unavailable (coastal cruising  
47 and fishing vessels, remote locations, etc.)

48  
49 **WHY AN ALTERNATIVE SERVICE?**

50  
51 The petitioner recently completed an extended period of experimentation  
52 wherein regularly scheduled transmissions of news and information utilizing  
53 traditional radio teleprinter transmission technology were done on a daily basis.  
54 The results of the experimentation determined that however well-served  
55 America is by its traditional broadcast news services, there is a desire on the  
56 part of some segments of the general public for other means of news and  
57 information dissemination in a printed format that can be received and then read  
58 at a later time, or preserved for future reference.

59  
60 **THE EXPERIMENT**

61  
62 The petitioner applied to the FCC's Office of Engineering and Technology for an  
63 experimental license, the purpose of which was to determine the public interest  
64 in receiving radio-teleprinter transmissions, commonly known as RTTY  
65 (RadioTeletype).

66  
67 The OET granted a Special Temporary Authority, assigning station callsign  
68 WA9XHN, and assigned two frequencies in the High-Frequency bands, 6994 KHz

69 and 13972 KHz, and authorized radioteletype transmissions of news and other  
70 information. Other technical requisites included frequency tolerances of .005  
71 percent, and a power level of 1000 watts. The first STA period was six months.  
72 A second STA extended operations for approximately nine additional months,  
73 after which time the license application was approved allowing transmissions to  
74 continue for a period of one year. The assigned callsign for the period of the  
75 license was WC2XPF.

76  
77 The authorizations and license resulted in a rigorous transmission schedule  
78 which developed into an average on-air time of approximately 32 hours per  
79 week. Frequency utilization was approximately 50 percent on 6994 KHz and 50  
80 percent on 13972 KHz. Time of day and seasonal propagation changes were  
81 determining factors.

82  
83 The steady schedule was maintained so that those interested in receiving the  
84 transmissions would become confident that they could rely on the presence of  
85 the transmissions at the specified times. They might not listen/copy every day,  
86 but as in the AM/FM/TV broadcast industry, not everyone listens/watches every  
87 day, but they know that the services are there in the event they desire to tune in  
88 to the transmissions.

90   **Transmission speed was sixty words per minute with the exception of Fridays,**  
91   **when the speed was increased to 100 words per minute. The duration of the**  
92   **experimental period of the transmissions was approximately 21 months.**

93  
94   **The material transmitted was gleaned from the internet, consisting of a variety**  
95   **of sources and types of content, including White House Press Releases, press**  
96   **releases from all military services and the Coast Guard, and sources such as**  
97   **WWW.NewsMax.com, WWW.CNSNEWS.COM, WWW.HOWSTUFFWORKS.COM,**  
98   **WWW.EmergencyNetNews.COM, and WWW.PRNEWSWIRE.COM, to name a few.**

99   **Permissions were granted by the sources, and all bylines and source credits**  
100   **were given at the end of all items.**

101  
102   **The material was formatted and transmitted in a manner so as to resemble the**  
103   **formats of the era when UPI, AP, etc. were using the high-frequency bands to**  
104   **move news all over the globe, in the era before satellites, internet, and fiber-**  
105   **optic cable.**

106  
107   **Utilization of some clever software even allowed such activities as RTTY "Talk-**  
108   **Shows", wherein an individual sitting in his location wherever, could type on his**  
109   **computer keyboard, and it would be transmitted over the air. It seemed fair that**  
110   **if radio talk shows could do it, so could this station.**



112 **Quality and “good taste” were paramount issues. No expletives were ever**  
113 **transmitted, and though the station periodically transmitted jokes of various**  
114 **types, the reader’s mind was used as a canvas, with acceptable wording used**  
115 **as the paint.**

116  
117 **Last but not least, an old broadcast industry tradition was maintained wherein**  
118 **when signing off, the lyrics of The National Anthem closed each transmission.**  
119 **It is impossible to play music on a teletype machine, but many good comments**  
120 **were received regarding this practice.**

121  
122 **WHO COULD and WHO WAS LISTENING TO/COPYING THE TRANSMISSIONS?**

123  
124 **Recreational Vehicle owners, pleasure boating enthusiasts, commercial fishing**  
125 **and other marine endeavors, and people living in remote locations are typical of**  
126 **those who could be served by the proposed service.**

127  
128 **Electronic and radio hobbyists and short-wave listeners (SWLs) definitely took**  
129 **interest in the experimental transmissions. The radio periodical “Monitoring**  
130 **Times” regularly printed short items about RTTY transmissions from WC2XPF.**

131  
132 **Throughout the period of the experiment the station received e-mail and**  
133 **telephone calls from persons all over the contiguous United States, Alaska,**  
134 **Hawaii and Puerto Rico, and neighboring countries such as Canada and Mexico.**

**Some of the more distant points of reception included Northern New Zealand and Kwajalein Island.**

**One very interesting communication was from a truck driver who was copying the transmission on a laptop computer in the cab of his truck as he traveled from Eau Claire, Wisconsin en route to Chicago. Another was a photo sent in by a fellow from Norman, Oklahoma, who was using a Teletypewriter Device for the Deaf (TDD) to copy the broadcast. Please view the photo in EXHIBIT ONE of the exhibits.**

**Boats and other marine installations usually have the capability of High-Frequency radio communications. This is a Coast Guard requirement if the vessel is to be traveling offshore. The on-board communications equipment, in concert with a laptop or PC computer, can be used to receive all proposed modes of transmission.**

**WHAT METHODS CAN BE EMPLOYED TO RECEIVE THE TRANSMISSIONS?**

**Traditionally, news information via radio was received by using short-wave receivers, specialized demodulation equipment, and printed by mechanical means known teletypewriters. Many such arrangements still exist.**

**The advent of the home-based computer has made reception of such signals far easier, more accurate, and considerably quieter. Today, a simple short-wave receiver, and a computer with a sound card can be used to print or view information transmitted by all of the proposed modulation methods. The software to do so is available without charge from many sources, and installations can be as compact as a small radio and a laptop computer. Several reception reports were received by e-mail, with the e-mail often being generated and transmitted while the computer on which it was written was still copying the incoming transmission.**

#### **THE SURVEY**

**The last month and a half before the WC2XPF license was to expire, solicitations were made both over the air and on the internet website, [WWW.RTTY.COM](http://WWW.RTTY.COM), for input from interested parties as to their interest and response to our transmissions. Demographic information such as name, location, and other generic data was requested.**

**Additionally and most importantly, a comment area was provided so as to allow space for those who wished to do so, to express their thoughts on the transmissions. It was felt to be imperative that the comments be the respondents own thoughts, and not a "rubber stamp" approval of supplied**

wording. The format and wording of the survey is presented as a part of  
EXHIBIT TWO.

The results of the survey were gratifying and encouraging, and are the impetus  
for the submission of this petition. The petitioner believes the results of the  
survey, presented in EXHIBIT TWO clearly establish a desire and/or need on the  
part of the general public for continued transmissions of the nature the  
experimental service provided.

The members of the Commission are urged to examine the responses to the  
survey and arrive at their own conclusions as to whether or not the public  
interest would be served by the proposed service.

#### THE CONCLUSION OF THE EXPERIMENT

As the end of the WC2XPF license period approached, application for renewal of  
the Experimental License was made, so as to be able to continue the  
transmissions and therefore maintain the momentum which had been achieved  
by the end of the license period.

The OET response was in general agreement with the assessment that the  
experiment was successful in that it did prove an interest and need on the part  
of the general public for such a service.

202 It was felt, however, that further transmissions would be beyond of the spirit of  
203 the Experimental Radio Service. The time had come to pursue licensing  
204 specifically permitting the transmission to the general public text-based news  
205 and information employing standard data transmission formats and techniques,  
206 and on frequencies in the High-Frequency radio bands.

207  
208 **WHY CAN THERE BE NO TEXT DATA TRANSMISSIONS AT THIS TIME?**

209  
210 The Rules of the Commission permitting news and information transmission to  
211 the general public of the United States via High-Frequency radio utilizing any  
212 transmission mode do not exist!

213  
214 Part 23 of the Commission's rules deals with domestic and international fixed  
215 point-to-point public correspondence and point-to-point public press issues, but  
216 does not allow for transmissions directed to non-subscribing receiving stations  
217 or to the public at large.

218  
219 Regarding shortwave broadcasting. Part 73.701 of the Commission's rules  
220 which defines international broadcasting stations, specifically states that the  
221 transmissions from American shortwave broadcast stations are intended to be  
222 received directly by the general public in foreign countries. Additionally, the  
223 International Broadcast Rules require transmission facilities, power levels and

224 antenna systems such as to provide high signal strength levels in the distant  
225 "target" countries.

226  
227 Facilities of this magnitude are unwarranted for digital mode transmission of  
228 press and information to the general public of the United States.

229  
230 **THE HOMELAND PUBLIC PRESS and INFORMATION WIDECAST SERVICE -**  
231 **WHAT IS ENVISIONED?**

232  
233 President Bush initiated the establishment of the Department of Homeland  
234 Security as a means of uniting America's people and resources into a cohesive  
235 system wherein the talents, expertise and the services of American citizens  
236 could be called upon to enhance and protect the security of The United States of  
237 America. The petitioner believes that the establishment of the Homeland Public  
238 Press and Information Widecast Service would fully embody the spirit of the  
239 Department of Homeland Security, and would result in a text-based data  
240 transmission network whose stations, licensees, and diverse locations would  
241 prove to be excellent adjuncts to national arrangements such as the SHARES  
242 communications system, and other similar systems already in place. The  
243 service also would provide for unattended monitoring of Department of  
244 Homeland Security alerts and bulletins by various state and local government  
245 agencies as well as the citizenry.

**There are several aspects of the proposed service which decidedly differentiate it from the Domestic and the International Broadcasting Services.**

**The first consideration is that the service should be a totally voluntary service, one for which no revenues or financial considerations for pecuniary gain would be permitted. The burden of the expense entailed in establishing the proposed stations and network would be borne by those volunteering their time and expertise to become licensed and then establish their transmitting facilities.**

**The nature of the proposed service would be to provide, as a public service and on a regular basis, text-based radio transmissions utilizing digital transmission modes including radioteletype, AMTOR/SITOR FEC (Forward Error-Correcting), and Phase-Shift Keying (PSK-31).**

**A nation-wide network of volunteer stations is foreseen.**

**Each station would be an entity wholly separate from any other in ownership, but operated as a part of a cooperative, coordinated effort directed towards the purpose of news and information dissemination.**

**Licensees should be Citizens of the United States of America. Character checks and background investigations so as to preclude individuals of questionable nature from obtaining licensing should be considered.**

270 **Licensees should possess technical competence and expertise in RF**  
271 **Transmission practices. A General Radiotelephone License, or Advanced Class**  
272 **or above Amateur Radio License would be considered adequate documentation**  
273 **to this effect.**

274

275 **Stations in the service should be required to have a capability of a minimum of**  
276 **500 watts output, and a maximum of 2000 watts transmitter power output.**

277

278 **Antenna systems should be non-directional/omni-directional, and employ good**  
279 **engineering practices in their design and construction.**

280

281 **Station facilities should be of a quality so as to instill complete confidence by**  
282 **the Commission in meeting technical requirements for frequency stability,**  
283 **purity of emissions, and station reliability. Type-Accepted RF generation and**  
284 **transmission equipment should be mandatory.**

285

286 **Stations should be required to be capable of operating on power sources**  
287 **completely independent of normal power sources, so as to be able to remain on-**  
288 **the-air in the event of conditions or events wherein the ability to maintain**  
289 **transmissions is vital to the public interest.**

290

291 **Modulation monitoring, frequency monitoring, and output power**  
292 **instrumentation equipment should be in use whenever the station is active.**



293 **Logging of activities should be automatic and incorporated within the widecast**  
294 **station's operational control system.**

296 **The frequencies utilized should be in the HF (3 to 30 MHz) Frequency bands, on**  
297 **frequencies specifically designated for this proposed class of service.**

299 **Frequency usage and transmission schedules should be coordinated by a**  
300 **central coordination entity in a manner so as to most efficiently use the**  
301 **allocated spectrum space, be consistent with propagation conditions, and to**  
302 **optimize coverage of all areas of the United States.**

304 **A COOPERATIVE EFFORT**

306 **The FCC has enjoyed phenomenal success with the cooperative efforts between**  
307 **the FCC and the American Radio Relay League as pertain to licensing,**  
308 **enforcement, and other administrative activities associated with the Amateur**  
309 **Radio Service.**

311 **The petitioner asserts that a similarly successful arrangement for the proposed**  
312 **service could be afforded by the establishment of an organization whose**  
313 **responsibilities would be to foster and promote the proposed service, assist the**  
314 **FCC with routine administrative activities, and offer licensees and interested**

parties assistance with issues such as scheduling and frequency usage  
coordination, technical issues and expertise, and public inquiry and response.

The petitioner has therefore undertaken the task of establishing and registering  
a not-for-profit organization known as The National Association of Data  
Widecasters (NASDAW). This is a Washington state based not-for-profit  
corporation. EXHIBIT THREE is a copy of the Articles of Incorporation of  
NASDAW, with a brief synopsis of the purpose and intent of NASDAW.

The petitioner submits that very positive cooperative efforts between the FCC,  
NASDAW, and the station licensees of said service could be established in very  
short order.

**PROPOSED HOMELAND PUBLIC PRESS and INFORMATION WIDECAST**  
**SERVICE RULES**

The petitioner has included as EXHIBIT FOUR of this document a set of  
proposed rules for the service. The proposed rules are patterned after those  
found in various sections of parts 23, 73, 74, 97, and other parts of the  
Commission's rules as found to be applicable.

336   **The proposed rules are presented in general language as opposed to legalese.**

337   **The petitioner feels the rules should be understandable to all, and not need**  
338   **interpretation.**

339  
340   **Insofar as Part 96 of the Commission's Rules does not exist, the numbering of**  
341   **the proposed rules shows them to be Part 96. This is done for convenience**  
342   **purposes.**

343  
344   **APPLICATION PROCESS**

345  
346   **Applications for radio services under the cognizance of the Wireless**  
347   **Telecommunications Bureau are made employing FCC Form 601 and**  
348   **appropriate schedules.**

349  
350   **EXHIBIT FIVE Part A and Part B are examples of Form 601 Main Form**  
351   **Instruction Sheets and Schedule D Instruction Sheets which have been modified**  
352   **to reflect the addition of the Homeland Public Press and Information Widecast**  
353   **Service to the tables of services covered by Form 601 Main Form and Schedule**  
354   **D. The Radio Service Code "HW" has been added to reflect the "Homeland**  
355   **Public Press and Information Widecast" service.**

356  
357   **EXHIBIT FIVE Part C is a prototype Schedule W Instruction Sheet, and EXHIBIT**  
358   **FIVE Part D is a prototype Schedule W Form which would be specific to the**

359 **proposed Widecast service, and would detail the Widecast applicant's**  
360 **qualifications and details of his proposed facility.**

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## SUMMARY

**This Petition for Rulemaking has attempted to detail to the Commission the efforts of the petitioner to establish a case for positive consideration for the proposed Homeland Public Press and Information Widecast Service, a service which would employ tried and true technology to conduct its mission, yet include recent accomplishments in communications techniques.**

**The manner of presentation has been to provide a true and accurate description of the efforts expended, yet not go into reams of exacting detail and countless footnotes and references, which would detract from its intent of being a concise and interesting read.**

**The project has evolved from the perspective of curiosity and a fondness for a seemingly outdated technology, into the realization that the proposed service would benefit our country by enabling another means of information distribution. Those who would care to become involved would be in step with the President's request that we do what we can for America.**

**The licensee would bear the cost burden of establishing his facility. Contrasted with the pleas of state and local governments for Federal funding for Homeland Security measures, the proposed service is most certainly an exception.**

405 47 CFR 1.1114 and 1.1162 of the FCC rules cite cases wherein exemptions from  
406 charges and regulatory fees are proper. It is suggested that the proposed new  
407 service would readily fall within the qualification guidelines of 1.1114 and  
408 1.1162, and would therefore be fee exempt.

409  
410 The petitioner has endeavored to establish The National Association of Data  
411 Widecasters, (NASDAW) which is in principle similar to more prominent  
412 organizations whose intents and purposes are supportive to the interests of  
413 FCC licensees and services they represent, the FCC, and of the general public.

414  
415 This petition concludes by presenting the Commission with a proposed set of  
416 rules and forms fashioned after those applicable to other FCC licensed services,  
417 but with considerations specific to text data transmission and its unique  
418 requirements. The proposed rules and forms endeavor to evidence a sincere  
419 desire to demonstrate responsibility, prescribe good technical standards, and  
420 establish the proposed service as a viable entity.

421  
422 Thank you for your consideration.

423  
424  6-23-03

425 George B. Hutchison

426 11224 SE 320<sup>th</sup> Street

427 Auburn, Washington 98092-4832

EXHIBIT 1

## **EXHIBIT ONE**



**WC2XPF Being Copied On  
Teletypewriter Device for the Deaf(TDD)**

**Photo sent in by  
J. Carter Thompson  
Oklahoma City, OK**



---

EXHIBIT 2